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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

NORTHWEST CENTER FOR  
ALTERNATIVES TO PESTICIDES,  
WILLAMETTE RIVERKEEPER,  
CASCADIA WILDLANDS, NEIGHBORS  
FOR CLEAN AIR, AND 350PDX,

Plaintiffs,

vs.

U.S. DEPARTMENT OF HOMELAND  
SECURITY; CHAD WOLF, in his capacity  
as Acting Secretary, U.S. Department of  
Homeland Security,

Defendants.

No. 3:20-cv-01816

**STANDING DECLARATION OF  
JOSH LAUGHLIN, EXECUTIVE  
DIRECTOR OF CASCADIA  
WILDLANDS**

I, JOSH LAUGHLIN, declare as follows:

1. My name is Josh Laughlin. I am over 18 years of age and reside in Eugene, Oregon. I make this declaration based on my own personal knowledge, and if called as a witness, I could and would competently testify to the facts herein under oath. As to matters which may reflect a matter of opinion, they reflect my personal opinion and judgment based on my personal experience.

2. My principal place of business is Cascadia Wildlands, 120 Shelton McMurphey Blvd., STE 240, Eugene, OR 97401.

3. I am the Executive Director and a member and supporter of Cascadia Wildlands, a 501(c)(3) non-profit corporation. I have been involved with Cascadia Wildlands since its founding in 1998. I oversee and am intimately familiar with the organization's membership, activities, and operations.

4. I make this declaration in support of Cascadia Wildlands' participation in the National Environmental Policy Act (NEPA) lawsuit filed with this Court. The interests Cascadia Wildlands seeks to advance as a co-plaintiff fall squarely within the organization's mission.

5. Cascadia Wildlands' mission is to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, a stable climate, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. In pursuit of this mission, we work with a broad range of individuals and organizations. This is our shared strength. We recognize that confronting social injustice is essential to achieving our mission, as well as being a moral imperative in its own right.

6. Our organization believes that the chemicals being deployed by federal agents in Portland are harming the communities and environment we are dedicated to protect. We believe basic information concerning the chemicals being used will allow our supporters to make choices about how to protect their health, the health of their families and the environment.

7. Cascadia Wildlands' members and supporters have seen these chemicals repeatedly used for domestic control in Portland in 2020 without clear identification of the chemicals deployed, and without examining the impacts to community and environmental health. This greatly concerns our organization and directly relates to the organization's mission to defend the communities of the Cascadia Bioregion and confront social injustice.

8. Cascadia Wildlands has approximately 1,000 members and online supporters who reside in Portland. We regularly communicate with them through an e-newsletter, our biannual *Cascadia Review* hardcopy newsletter, campaign specific emails and action alerts, and on an individual basis.

9. Cascadia Wildlands is concerned about the potential negative impacts the chemicals released by federal agents in response to public protests have had and are having on the human health of Portland residents, including our supporters, and the ecosystem around Portland.

10. Cascadia Wildlands' organizational interests in defending the communities of our region have been harmed because the US Department of Homeland Security has not conducted an environmental analysis on the impacts of the use of chemical agents as NEPA requires. Should Cascadia Wildlands be unable to bring suit to enforce the agency's compliance with NEPA, we will be unable to effectively provide information to our supporters about the potential impact to their health, and we will be unable to address environmental pollution, harm to ecosystem health, and potential impacts to the residents who live in Portland.

11. If the agency had followed NEPA, my interests and those of Cascadia Wildlands, its members and supporters would be protected. If the agency were to conduct a NEPA analysis, it would identify information allowing me to educate myself, Cascadia Wildlands' members and supporters, and the public about the use of chemicals during the Portland protests and the impacts of these chemicals on human and environmental health. The agency's NEPA analysis would also result in a federal action that would not cause as much harm to environmental health because, as required by NEPA, harm identified through the NEPA process would have to be mitigated.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18<sup>th</sup> day of October, 2020 in Eugene, Oregon.

A handwritten signature in blue ink that reads "Josh Laughlin". The signature is fluid and cursive, with the first name "Josh" and last name "Laughlin" clearly distinguishable.

Josh Laughlin, Executive Director  
Cascadia Wildlands